

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

R. ALEXANDER ACOSTA, Secretary of Labor,)	
United States Department of Labor,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 4:16-cv-3162
)	
FIVE OAKS ACHIEVEMENT CENTER, LLC)	
d/b/a FIVE OAKS ACHIEVEMENT CENTER;)	
WHISPERING HILLS ACHIEVEMENT)	
CENTER, LLC d/b/a WHISPERING HILLS)	
ACHIEVEMENT CENTER; and NORTH FORK)	
EDUCATIONAL CENTER, LLC d/b/a)	
NORTH FORK EDUCATIONAL CENTER,)	
)	
Defendants.)	

**JOINT NOTICE OF PENDING SETTLEMENT AND MOTION TO STAY THE
PROCEEDINGS IN ORDER TO FILE THE CONSENT JUDGMENT**

Plaintiff, R. Alexander Acosta, Secretary of Labor, United States Department of Labor (“the Secretary”), and Defendants, Five Oaks Achievement Center, LLC d/b/a Five Oaks Achievement Center (“Five Oaks”), Whispering Hills Achievement Center, LLC d/b/a Whispering Hills Achievement Center (“Whispering Hills”), and North Fork Educational Center, LLC d/b/a North Fork Educational Center (“North Fork”) (collectively referred to as “Defendants”), submit this joint notice of pending settlement. The Secretary and Defendants have negotiated a settlement through their respective counsel.

Due to the structure of the settlement, the parties represent that they are still finalizing the language of the Consent Judgment that will be filed with the Court. The parties anticipate submitting the Consent Judgment for the Court’s consideration within thirty (30) days. The parties respectfully request that the deadlines in this matter and the proceeding be stayed for

thirty (30) days to allow the parties to finalize the Consent Judgment without incurring the expense to meet the currently pending deadlines.

Respectfully Submitted,

/s/ Stephen Stapleton
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Signed this 25th day of May, 2018.

Attorneys for Defendants.

Respectfully Submitted,

KATE O'SCANNLAIN
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Signed this 25th day of May, 2018

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Attorneys for Plaintiff.

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of May, 2018, I electronically transmitted the foregoing document to the Clerk of Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/s/ Kristina T. Harrell
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